

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**SVETLANA LOKHOVA,**

**Plaintiff,**

**v.**

**STEFAN A. HALPER, DOW JONES &  
COMPANY, INC., THE NEW YORK TIMES  
COMPANY, WP COMPANY, LLC,  
NBCUNIVERSAL MEDIA, LLC, and  
MALCOLM NANCE,**

**Defendants.**

Case No. 1:19-cv-00632-TSE-JFA

**MOTION BY DEFENDANT DOW JONES & COMPANY, INC.  
TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 12(b)(6) and Local Civil Rule 7, Defendant Dow Jones & Company, Inc. d/b/a *The Wall Street Journal* ("WSJ"), through counsel, moves this Court for an Order dismissing the Amended Complaint in this action with prejudice for the reasons set forth in the accompanying Memorandum of Law.

WHEREFORE, WSJ respectfully requests that the Court grant this Motion and enter an Order dismissing the Amended Complaint with prejudice.

**MEET AND CONFER CERTIFICATION**

Pursuant to Local Civil Rule 7(E), undersigned counsel hereby certify that counsel for Defendant Dow Jones & Company, Inc. met and conferred telephonically with counsel for Plaintiff Svetlana Lokhova on September 5, 2019. Counsel for Plaintiff advised that he was unwilling to withdraw the Amended Complaint or any of its claims.

Dated: September 12, 2019

Respectfully submitted,

BALLARD SPAHR LLP

By /s/ Matthew E. Kelley

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*Counsel for Defendant*

*Dow Jones & Company, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on September 12, 2019, I caused a true and correct copy of the foregoing Motion by Defendant Dow Jones & Company, Inc. to Dismiss Plaintiff's Amended Complaint to be filed electronically with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all interested parties.

/s/ Matthew E. Kelley  
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